

Fill in this information to identify the case:

United States Bankruptcy Court for the:

District of New Jersey



(State)

Case number (if known): 24- Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/24

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Highland Park Apts LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names, and *doing business* as names

3. Debtor's federal Employer Identification Number (EIN)

4. Debtor's address

Principal place of business

100 Franklin Square Drive

Number Street

Suite 401

Somerset

NJ

08873

City

State

ZIP Code

United States

County

Mailing address, if different from principal place of business

c/o Lynd Living

Number Street

4499 Pond Hill Road

P.O. Box

San Antonio

TX

78231

City

State

ZIP Code

Location of principal assets, if different from principal place of business

2351 Southeast Bellview Avenue

Number Street

Topeka

KS

66605

City

State

ZIP Code

5. Debtor's website (URL)

Debtor	Highland Park Apts LLC	Case number (if known)	24-
<b>6. Type of debtor</b>	<div style="margin-left: 20px;"><input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____</div>		
<b>7. Describe debtor's business</b>	<div style="margin-left: 20px;">A. Check one: <input type="checkbox"/> Health Care Business (as defined in 11 U.S.C. § 101(27A)) <input checked="" type="checkbox"/> Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B)) <input type="checkbox"/> Railroad (as defined in 11 U.S.C. § 101(44)) <input type="checkbox"/> Stockbroker (as defined in 11 U.S.C. § 101(53A)) <input type="checkbox"/> Commodity Broker (as defined in 11 U.S.C. § 101(6)) <input type="checkbox"/> Clearing Bank (as defined in 11 U.S.C. § 781(3)) <input type="checkbox"/> None of the above</div> <div style="margin-left: 20px; border-top: 1px solid black; padding-top: 5px;">B. Check all that apply: <input type="checkbox"/> Tax-exempt entity (as described in 26 U.S.C. § 501) <input type="checkbox"/> Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3) <input type="checkbox"/> Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))</div> <div style="margin-left: 20px; border-top: 1px solid black; padding-top: 5px;">C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <a href="http://www.uscourts.gov/four-digit-national-association-naics-codes">http://www.uscourts.gov/four-digit-national-association-naics-codes</a>. ____</div>		
<b>8. Under which chapter of the Bankruptcy Code is the debtor filing?</b>	<div style="margin-left: 20px;">Check one: <input type="checkbox"/> Chapter 7 <input type="checkbox"/> Chapter 9 <input checked="" type="checkbox"/> Chapter 11. Check <b>all</b> that apply: <div style="margin-left: 20px;"><input type="checkbox"/> Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that). <input type="checkbox"/> The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B). <input type="checkbox"/> The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11. <input type="checkbox"/> A plan is being filed with this petition. <input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b). <input type="checkbox"/> The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the <i>Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11</i> (Official Form 201A) with this form. <input type="checkbox"/> The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.</div> <input type="checkbox"/> Chapter 12</div>		
<b>9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?</b>  If more than 2 cases, attach a separate list.	<div style="margin-left: 20px;"><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. District _____ When _____ Case number _____ MM / DD / YYYY District _____ When _____ Case number _____ MM / DD / YYYY</div>		

Debtor Highland Park Apts LLC Case number (if known) 24-  
Name

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

List all cases. If more than 1, attach a separate list.

☒ No

☐ Yes. Debtor \_\_\_\_\_ Relationship \_\_\_\_\_  
District \_\_\_\_\_ When \_\_\_\_\_  
Case number, if known \_\_\_\_\_ MM / DD / YYYY

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
What is the hazard? \_\_\_\_\_
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other \_\_\_\_\_

**Where is the property?**

Number \_\_\_\_\_ Street \_\_\_\_\_  
City \_\_\_\_\_ State ZIP Code \_\_\_\_\_

**Is the property insured?**

- ☐ No
- ☐ Yes. Insurance agency \_\_\_\_\_  
Contact name \_\_\_\_\_  
Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

**14. Estimated number of creditors**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input type="checkbox"/> 50-99           | <input type="checkbox"/> 5,001-10,000  | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199         | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999         |  |  |

Debtor Highland Park Apts LLC  
Name

Case number (if known) 24-

**15. Estimated assets**

<input type="checkbox"/> \$0-\$50,000	<input checked="" type="checkbox"/> \$1,000,001-\$10 million	<input type="checkbox"/> \$500,000,001-\$1 billion
<input type="checkbox"/> \$50,001-\$100,000	<input type="checkbox"/> \$10,000,001-\$50 million	<input type="checkbox"/> \$1,000,000,001-\$10 billion
<input type="checkbox"/> \$100,001-\$500,000	<input type="checkbox"/> \$50,000,001-\$100 million	<input type="checkbox"/> \$10,000,000,001-\$50 billion
<input type="checkbox"/> \$500,001-\$1 million	<input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> More than \$50 billion

**16. Estimated liabilities**

<input type="checkbox"/> \$0-\$50,000	<input checked="" type="checkbox"/> \$1,000,001-\$10 million	<input type="checkbox"/> \$500,000,001-\$1 billion
<input type="checkbox"/> \$50,001-\$100,000	<input type="checkbox"/> \$10,000,001-\$50 million	<input type="checkbox"/> \$1,000,000,001-\$10 billion
<input type="checkbox"/> \$100,001-\$500,000	<input type="checkbox"/> \$50,000,001-\$100 million	<input type="checkbox"/> \$10,000,000,001-\$50 billion
<input type="checkbox"/> \$500,001-\$1 million	<input type="checkbox"/> \$100,000,001-\$500 million	<input type="checkbox"/> More than \$50 billion

### Request for Relief, Declaration, and Signatures

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature of authorized representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/10/2024  
MM / DD / YYYY

**X** /s/ Elizabeth A. LaPuma

Signature of authorized representative of debtor

Title Independent Fiduciary

Elizabeth A. LaPuma

Printed name

**18. Signature of attorney**

**X** /s/ Kenneth A. Rosen

Signature of attorney for debtor

Date 12/10/2024

MM / DD / YYYY

Kenneth A. Rosen

Printed name

Ken Rosen Advisors PC

Firm name

80 Central Park West

Number Street

New York

City

NY

State

10023

ZIP Code

(973) 493-4955

Contact phone

Ken@kenrosenadvisors.com

Email address

021601979

Bar number

NJ

State

PRIVILEGED & CONFIDENTIAL  
ATTORNEY WORK PRODUCT

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR DISTRICT OF NEW JERSEY**

\_\_\_\_\_  
In re:

HIGHLAND PARK APTS LLC,

Debtor.  
\_\_\_\_\_

)  
) Chapter 11  
)  
) Case No. 24-\_\_\_\_\_ (\_\_\_\_)  
)  
)  
)  
)

**CORPORATE OWNERSHIP STATEMENT  
AND LIST OF EQUITY SECURITY HOLDERS  
PURSUANT TO FED. R. BANKR. P. 1007(a)(1), 1007(a)(3), AND 7007.1**

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Pursuant to rules 1007(a)(1), 1007(a)(3) and 7007.1 of the Federal Rules of Bankruptcy Procedure, Highland Park Apts LLC as debtor and debtor in possession in the above-captioned case (the “**Debtor**”) states as follows:

1. Crown Capital Holdings LLC owns 99% of the equity interests in the Debtor.
2. Highland Park Apts MM LLC owns 1% of the equity interests in the Debtor.

**Fill in this information to identify the case:**

Debtor name Highland Park Apts LLC  
 United States Bankruptcy Court for the: \_\_\_\_\_ District of New Jersey  
 (State)  
 Case number (If known): 24- \_\_\_\_\_

☐ Check if this is an amended filing

**Official Form 204**

**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	X-Caliber Funding LLC 3 W Main Street, Suite 103 Irvington, NY 10533	c/o Paige Barr Tinkham Blank Rome LLP paige.tinkham@blankrome.com  R. Patrick Riordan; Kevin J. Grauberger; Lauren E. Bartee Riordan, Fincher & Mayo, P.A. riordan@rfm-law.com grauberger@rfm-law.com bartee@rfm-law.com	MortgageLoan				
2							
3							
4							
5							
6							
7							
8							

Debtor Highland Park Apts LLC Case number (if known) 24-  
Name

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

**RESOLUTIONS OF THE INDEPENDENT FIDUCIARY**  
**December 9, 2024**

After due deliberation, the undersigned, being the independent fiduciary and authorized signatory of Highland Park Apts LLC (the “**Company**”), does hereby consent to, adopt, and approve the following resolutions pursuant to the operating agreement of the Company (as amended or amended and restated to date) and the laws of the state of Delaware:

**Chapter 11 Filing**

**WHEREAS**, pursuant to the written consent of the sole shareholder of CBRM Realty Inc. (“**CBRM**”), dated as of September 26, 2024, Elizabeth A. LaPuma was appointed as the sole director of CBRM and, in connection therewith, the sole shareholder of CBRM appointed the Independent Fiduciary as proxy and attorney-in-fact to vote, consent, and exercise any similar rights with respect to any and all shares of common stock of CBRM upon all matters to which the shareholder is entitled to vote, consent, or exercise similar rights (the “**Independent Fiduciary**”);

**WHEREAS**, the Independent Fiduciary has had the opportunity to consult with the Company’s financial and legal advisors and fully consider each of the strategic alternatives available to the Company;

**WHEREAS**, based on a review of all available information regarding the Company, the Independent Fiduciary deems it advisable and in the best interests of the Company, its creditors, and other stakeholders to take the actions specified in the following resolutions; and

**WHEREAS**, the Independent Fiduciary has notified the manager of member Highland Park Apts MM LLC of the Company’s intention to commence a case under the provisions of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) and such manager of member Highland Park Apts MM LLC has not objected to such filing.

**NOW, THEREFORE, BE IT,**

**RESOLVED**, that in the business judgment of the Independent Fiduciary, it is desirable and in the best interests of the Company, its creditors, and other parties in interest to file, or cause to be filed, a voluntary petition for relief (the “**Chapter 11 Case**”) under the provisions of chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of New Jersey (the “**Bankruptcy Court**”) and any other petition for relief or recognition or other order that may be desirable under applicable law in the United States, and to take any and all actions, that the Independent Fiduciary deems necessary or appropriate.

**RESOLVED**, that the Independent Fiduciary (the “**Authorized Signatory**”) is hereby authorized, empowered, and directed, with the assistance of the Company’s advisors, to execute and file on behalf of the Company all petitions, schedules, lists and other motions, applications, pleadings, papers, or documents, and to take any and all actions that the Independent Fiduciary deems necessary or proper to obtain such relief, including, without limitation, any action necessary to maintain the ordinary course operation of the Company’s business and in connection with the Chapter 11 Case, with a view to the successful prosecution of the case.

**Retention of Professionals**

**RESOLVED**, that the Authorized Signatory is hereby authorized and directed to employ a law firm to serve as general bankruptcy counsel to represent and assist the Company in carrying out its duties under the Bankruptcy Code, and to take any and all actions to advance the Company’s rights and obligations, including filing any motions, objections, replies, applications, or pleadings; and in connection therewith, the Authorized Signatory, with power of delegation, is hereby authorized and directed to execute



appropriate retention agreements, pay appropriate retainers, and to cause to be filed an appropriate application for authority to retain the services of the firm in accordance with applicable law.

**RESOLVED**, that the Authorized Signatory is hereby authorized and directed to employ any other professionals, including legal counsel, noticing agents, accountants, financial advisors, investment bankers, and other professionals, to assist the Company in carrying out its duties under the Bankruptcy Code; and in connection therewith, the Authorized Signatory, with power of delegation, is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers and fees, and cause to be filed an appropriate application for authority to retain the services of any other professionals as necessary.

**General**

**RESOLVED**, that the Authorized Signatory is hereby authorized and empowered, on behalf of and in the name of the Company, to amend, supplement, or otherwise modify from time to time the terms of any documents, certificates, instruments, agreements, financing statements, notices, undertakings, or other writings referred to in the foregoing resolutions.

**RESOLVED**, that in addition to the specific authorizations heretofore conferred upon the Authorized Signatory, the Authorized Signatory (and its designees and delegates) is hereby authorized and empowered, in the name of and on behalf of the Company, to take or cause to be taken any and all such other and further action, and to execute, acknowledge, deliver, and file any and all such agreements, certificates, instruments, and other documents and to pay all expenses, including but not limited to filing fees, in each case as in the Authorized Signatory's judgment shall be necessary, advisable, or desirable in order to fully carry out the intent and accomplish the purposes of the resolutions adopted herein.

**RESOLVED**, that all acts, actions, and transactions relating to the matters contemplated by the foregoing resolutions done in the name of and on behalf of the Company, which acts would have been approved by the foregoing resolutions except that such acts were taken before the adoption of these resolutions, are hereby, in all respects, approved and ratified as the true acts and deeds of the Company with the same force and effect as if each such act, transaction, agreement, or certificate has been specifically authorized in advance by resolution of the Independent Fiduciary.

**RESOLVED**, that the omission from these resolutions of any agreement, document, or other arrangement contemplated by any of the agreements, documents, or instruments described in the foregoing resolutions or any action to be taken in accordance with any requirement of any of the agreements or instruments described in the foregoing resolutions shall in no manner derogate from the authority of the Authorized Signatory to take all actions necessary, desirable, advisable, or appropriate to consummate, effectuate, carry out, or further the transactions contemplated by, and the intent and purposes of, the foregoing resolutions.

**RESOLVED**, that the Authorized Signatory (and its designees and delegates) is hereby authorized and empowered to take all actions or to not take any action in the name of the Company with respect to the transactions contemplated by these resolutions hereunder, as the Authorized Signatory shall deem necessary or desirable in such Authorized Signatory's reasonable business judgment to effectuate the purposes of the transactions contemplated herein.

\*\*\*\*

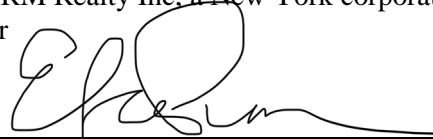
IN WITNESS WHEREOF, the undersigned has duly executed this consent as of the date first set forth above.

**MEMBER:**

CROWN CAPITAL HOLDINGS LLC, a Delaware  
limited liability company

By: CBRM Realty Inc, a New York corporation, its sole  
member

By:

A handwritten signature in black ink, appearing to read 'Elizabeth A. LaPuma', written over a horizontal line.

Elizabeth A. LaPuma  
Independent Fiduciary, as Authorized Signatory of  
CBRM Realty Inc.

Fill in this information to identify the case and this filing:

Debtor Name Highland Park Apts LLC  
United States Bankruptcy Court for the: \_\_\_\_\_ District of New Jersey  
(State)  
Case number (If known): 24-\_\_\_\_\_

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ Amended Schedule \_\_\_\_\_
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration Corporate Ownership Statement and List of Equity Holders

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/10/2024  
MM / DD / YYYY

X /s/ Elizabeth A. LaPuma  
Signature of individual signing on behalf of debtor

Elizabeth A. LaPuma  
Printed name

Independent Fiduciary  
Position or relationship to debtor